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6 *Attorneys for*
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **WESTERN DIVISION – ROYBAL FEDERAL BUILDING**
11

12 ANTHONY N. CHAI,

13 Plaintiff,

14 v.

15 NETFIRMS.COM, INC., *et al.*,

16 Defendants.

CASE No. CV11-06988-GHK (CWx)

**DECLARATION OF JULIE S.
TURNER IN SUPORT OF
NETFIRM.COM, INC.'S *EX*
PARTE APPLICATION FOR
ORDER GRANTING LEAVE TO
FILE SUR-SUR-REPLY**

17 Date: February 6, 2012 [vacated]
18 Time: 9:30 a.m.
Judge: The Hon. George H. King
19 Crtrm: 650

1 I, Julie S. Turner, declare:

2 1. I am a partner with the law firm of Turner Boyd LLP, which represents
3 Defendant Netfirms.com, Inc. in the instant lawsuit.

4 2. I make this declaration of my own personal knowledge. If called to
5 testify, I could and would do so competently.

6 3. On February 6, 2012, at approximately 7:35 p.m., my law firm's email
7 system received service of Plaintiff Anthony Chai's Ex Parte Application For
8 Order Granting Leave To File Sur-Reply and the supporting documents, through
9 the Court's ECF system.

10 4. On February 7, 2012, at approximately 2:30 p.m., I sent an email to
11 Mary-Christine Sungaila and Allison Lefrak, counsel for Plaintiff, informing them
12 that Netfirms would be filing its application for an order granting it leave to file a
13 sur-sur-reply, in the event that the Court were inclined to grant Plaintiff's
14 application for leave to file his sur-reply.

15 5. On February 7, 2012, at approximately 2:35 p.m., I conveyed the same
16 information directly to Allison Lefrak by telephone. Ms. Lefrak indicated that
17 Plaintiff would likely oppose Netfirms' application.

18 6. On February 7, 2012, at approximately 2:38 p.m., I received an email
19 from Ms. Sungaila acknowledging receipt of my email to her and also indicating
20 that Plaintiff would likely oppose Netfirms' application.

21 I declare under penalty of perjury that the foregoing is true and correct to the
22 best of my knowledge.

23 Dated: February 7, 2012

TURNER BOYD LLP

24 By: /s/ Julie S. Turner
25 Julie S. Turner

26 *Attorneys for Defendant*
27 *Netfirms.com, Inc.*

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